UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

Maria Suarez,

Plaintiff,

-against-

Case No. 2:19-cv-07271-JS-SIL

Southern Glazer's Wine and Spirits of New York, LLC,

Defendant.

DISCOVERY PLAN

Plaintiff Maria Suarez and Defendant Southern Glazer's Wine and Spirits of New York, LLC submit the following Proposed Discovery Plan in connection with the Initial Conference scheduled for January 20, 2021, at 12:00 P.M. (Eastern), and pursuant to the Court's Initial Conference Order (Doc. No. 11):

Deadlines & Court Appearances	Date
Exchange of Rule 26(a)(1) disclosures	January 18, 2021
Service of first interrogatories and document demands	February 3, 2021
Responses to first interrogatories and document demand	March 22, 2021
Motion to join new parties or amend the pleadings	April 5, 2021
Status conference in courtroom 820	TBD by Court
Status conference in courtroom 820 Completion of depositions	TBD by Court May 6, 2021
	•
Completion of depositions Identification of case-in-chief experts and	May 6, 2021
Completion of depositions Identification of case-in-chief experts and service of Rule 26 disclosures Identification of rebuttal experts and service of	May 6, 2021 July 5, 2021

Dated: January 12, 2021	
Steven John Moser Moser Law Firm, PC 3 School Street, Suite 207B Glen Cove, New York 11542 Phone: 516.671.1150 Email: smoser@moseremploymentlaw.com ATTORNEY FOR PLAINTIFF	Anjanette Cabrera Stephen Stecker Constangy, Brooks, Smith & Prophete LLP 620 Eighth Avenue, 38th Floor New York, New York 10018 Phone: 646.341.6536 Email: acabrera@constangy.com ATTORNEYS FOR DEFENDANT
20th January SO ORDERED THIS DAY OF	2021:
/s/ STEVEN I. LOCKE	
The Honorable Steven I. Locke United States Magistrate Judge	